UNITED STATED DISTRICT COURT

FOR THE

WESTERN DISTRIT OF PA

	CASE NO. 2:23-CV-206	4
TRAVIS CONKLIN) JURY TRIAL DEMANDED	
PLAINTIFF PROSE)	
V.)	
DEBORAH MONCRIEFF ET., AL)	
SHAMARA HOPKINS)	
DEFENDANTS)	

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

1. THE PARTIES TO THIS COMPLAINT

A. THE PLAINTIFF(S)

TRAVIS CONKLIN

ADDRESS: 1216 VINE ST APARTMENT 5 MCKEES ROCKS PA 15136

COUNTY: ALLEGHENY

PHONE NUMBER: 412-680-9077

EMAIL: TRAVISCONKLIN20@GMAIL.COM

B. THE DEFENDANT(S)

DEBORAH MONCRIEFF

FAMILY SERVICES SUPERVISOR

CENTRAL REGIONAL OFFICE

1401 FORBES AVE PITTSBURGH PA 15219

DEC 0 4 2023

CLERK, U.S. DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA C. SHAMARA HOPKINS

CYS WORKER

CENTRAL REGIONAL OFFICE

1401 FORBES AVE PITTSBURGH PA 15219

2. BASIS FOR JURISDICTION

THIS CASE IS BEING BROUGHT PERSUANT TO 42 U.S.C. SECTION 1983 THE UNITED STATES

CONSTITUTION AND THE CONSTITUTION OF THE COMMONWEALTH OF PENNSYLVANIA

FOR DEPRIVATIONS OF RIGHTS, PRIVLEDGES AND IMMUNITIES SECURED UNDER STATE AND

FEDERAL LAW

A. SECTION 1983 ALLOWS CLAIMS FOR THE "DEPRIVATION OF ANY RIGHTS, PRIVLEDGES, OR IMMUNITIES SECURED BY THE UNITED STATES CONSTITUTION AND THE CONSTITUTION OF THE COMMONWEALTH OF PENNSYLVANIA AS WELL AS ANY AND ALL STATE AND FEDERAL LAW VIOLATION THE FOLLOWING FEDERAL AND STATE CONSTITUTIONAL VIOLATIONS EXISTS: 6^{TH} AND 14^{TH} AMMENDMENT DUE PROCESS 14^{TH} AMMENDMENT DUE PROCESS 14^{TH} AMMENDMENT EQUAL PROTECTION CLAUSE FEDERAL STATUTE SECTION 911 CORRUPT ORGINIZATION FEDERAL STATUTE SECTION 241 CONSPIRACY AGAINST RIGHTS INFRINGEMENT ON THE RIGHT TO PEACE PROSPERITY AND THE PERSUIT OF HAPPINESS VIOLATION OF THE CONSTITUTION OF THE COMMONWEALTH OF PENNSYLVANIA ARTICLE 1 DECLARATION OF RIGHTS SECTION 1 INHERANT RIGHTS OF MAN KIND ABUSE OF POWER AND AUTHORITY ABUSE OF DISCRETION 8^{TH} AMMENDMENT RIGHT TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT SECTION 903 CRIMINAL CONSPIRACY UNDER THE PENNSYLVANIA CRIMES CODE 4^{TH} AMMENDMENT RIGHT TO BE SAFE AND SECURE IN MY PERSON FOR THEM UNJUSTIFIABLY SEIZING CUSTODY OF MY SON SAFARI MATTHEW SANDERS OUT OF AN ACT OF VINDICTIVE RETALIATION AS WELL AS THEIR EXTREME FAILURE TO PROTECT.

3. STATEMENT OF CLAIMS

ON OR ABOUT NOVEMBER 14,2023 MY SON S MEMORY S PEDIATRICIANS OFFICE FALSELY SENT MY SON VIA REFERRAL TO UPMC CHILDRENS HOSPITAL OF PITTSBURGH IN LAWRENCEVILLE FOR ALLEDGED MACROCEPHALY WHITCH IS AN ENLARGED CIRCUMFRANCE OF HIS HEAD THAT OF WHICH HE HAS HA SINCE BIRTH IF INFACT HIS DOCTER WOULD HAVE CHECKED HIS MEDICAL RECORDS THE DOCTER WOULD HAVE SEEN THAT HE HAS HAD A LARGER CIRCUMFRANCE OF HIS HEAD SINCE BIRTH AND NOT SENT US TO CHILDRENS HOSPITAL ON THOSE MEDICAL GROUNDS HIS PEDITRICIAN ASLO SENT US TO CHILDRENS HOSPITAL FOR HYPOTONIA OF WHICH IS RELATING TO AN ALLEDGED WEIGHT CONCERN OR ISSUE MY SON WAS WEIGHED AT APPROX. 2:00 PM ON NOVEMBER 14TH AT THE DOCTERS OFFICE AT 10 LBS 4OZ AT OR AROUND 8PM ON NOVEMBER 14TH MY SON WAS WEIGHED AGAIN BY CHILDRENS HOSPITAL WEIGHING AT 10LBS 11OZ IN BETWEEN THE PERIOD OF 2 PM AND APPROX. 8PM HE WAS FED 50ZS EVERY 3 HOURS OF WHICH IS A PERIOD OF 6 HOURS IN BETWEEN THOSE TWO TIME PERIODS GIVING MY SON A TOTAL OF 100ZS OFFEDDING GIVEN ONLY TEN OZS OF FEEDING MEDICALLY YOU COULD NOT MEDICALLY GAIN .70ZS OF WIGHT IN THAT SHORT AMMOUNT OF TIME WITH ONLY EATING 100ZS OFFORMULA THIS ALL OF WHICH CAN BE SUPPORTED BY HIS MEDICAL RECORDS A PREVIOUS CHILDLINE INVESTIGATION WAS ALREADY BEING CONDUCTED BY THE OFFICE OF CHILDREN YOUTH AND FAMILY AGAINST MY SONS MOTHER KAITLYN SANDERS FOR CHILD

ABUSE, CHILD NGLECT, EXTENSIVE USE OF DRUGS (MARIJUANA) THAT OF WHICH IS A MIND ALTERING DRUG OF WHICH ON OCCASIONS HAS CAUSED KAITLYN SANDERS TO NO REMEMBER WHETHER OR NOT SHE FED HIM OR ADMINISTERED HIS PRESCRIBED MEDICATION AS PRESCRIBED BY HIS DOCTER AS WELL AS HER FAILURE TO PROTECT HIM AS CAN BE SEEN AND SHOWN IN THE ATTACHED (EXHIBIT A) OF WHICH IS A SEVERE DIAPER RASH CAUSEDBY THE MOTHERS RECKLESS DISREGARD TO CARE FOR MY SON AND OR HER FAILURE TO PROTECT AND HER NEGLIGENCE AS HIS MOTHER TO PROVIDE ADDEQUATE CARE FOR HIM AS REQURIRED THIS SEVERE DIAPEER RASH WAS PHOTOGRAPHED .TO MY UNDERSANDING BY THE MCKEES ROCK POLICE DEPARTMENT AND CYS ON OCTOBER 26™ 2023 WHEN SHE WAS PICKED UP AT HER HOUSE ON A 302 MENTAL HEALTH WARRANT ON THE DAY I RECEIVED A CALL FROM THE MCKEES ROCKS POLICE DEPARTMENT TO COME PICK UP MY SON I THEN RECEIVED A CALL FROM A CYS WORKER WHOM WAS AT THE POLICE DEPARTMENT TELLING ME AND I QUOTE (WE HAVE A PLAN OF ACTION) I THEN ASKED THE QUESTION (WHAT IS YOUR PLAN OF ACTION) CYS STATED (COME GET YOUR SON AND TAKE HIM HOME) ("IF INFACT CYS HAD ANY ISSUE WITH REGARDS TO THE CARE I PROVIDE FOR MY SON THEY WOULD NOT HAVE ALLOWED HIM TO BE PLACE AND OR PUT IN MY CARE") THEY WERE ALSO CONCERNED ABOUT HER PRESENT BOYFRIEND WHOM SHE WAS DATING AT THAT TIME ("BRIAN STEVEN TRAVIS") A (TIER 1 REGISTERED SEX OFFENDER WHOM WAS AND IS ON PENNSYLVANIA MEGANS LAW THAT OF WHICH CAN BE SHOWN ON (EXHIBIT B) ATTACHED HERETO PICTURE OF HIS MEGANS LAW PROFILE ON THE 12TH OF NOVEMBER HE WAS ARRESTED BY THE MCKEES ROCKS POLICE DEPARTMENT FOR CHARGES OF STRANGULATION FOR ALLEDGED STRANGULATION OF MY SONS MOTHER KAITLYN SANDERS SEE ATTACHED (EXHIBIT C) SHOWING HIS ARREST BY THE MCKEES ROCKS POLICE DEPARTMENT FOR STRANGULATION CYS BROUGHT TO MY ATTENTION THAT THEY RECEIVED A PHONE CALL FROM AN EYE WITNESS ALLEDGING THAT SHE WAS SEEN BACK IN AUGUST SMACKING MY SON ACROSS HIS FACE SHE (KAITLYN SANDERS) STATED AT THE RECENT CYS PLACEMNET VIDEO HEARING THAT SHE HAD INFACT DONE HER RESEARCH ON SAID SEX OFFENDER AND FELT HE WASOK TO BE AROUND HER AND MY 4 MONTH OLD SON THAT OF WHICH WOULD RAISE QUESTION AND OR CONCERN REGARDING HER SEVERE UNDERLYING MENTAL DEFECT OF WHICH DUE TO ALL THESEALLEDGED CONCERNS AGINST KAITLYN SANDERS THE ALLEDGED PERPATRATER OF THERE INVESTIGATION AT THAT TIME CYS FILED A DEPENDANCY HEARING FOR SOMETIME IN DECEMBER RAISING THESE ALLEGATIONS REFERENCED HERE IN AS WELL AS REFERENCING WHERE KAITLYN ADMITTED TO BEIN PRESCRIBED PSYCH MED THAT OF WHICH SHE ADMITTED SHE DOES NOT TAKE SHE ADMITTED TO AN EXTENSIVE HISTORY OF DRUG USEAGE AS WELL CYS OFFERED HER DRUG AND ALCOHOL TREATMENT REFERRAL OF WHICH SHE CLEARLY REFUSED SEE ATTACHED (EXHIBIT D DEPENDANCY PETITION FILED BY CYS) WHILE MY SON WAIN THE HOSPITAL I WAS THERE ON A CONSTANT BASIS PROVIDING ADDEQUTAE CARE FOR MY SON THAT OF WHICH HIS MOTHER COULD NOT ADDEQUATELY PROVIDE FOR MY SON ON HER PART ON NOVEMBER 20TH MY BROTHER BROUGHT ME MY MAIL THAT I HAD RECEIVED AT MY RESIDENCE DUE TO THE FACT THAT I WAS CONTINUING TO REMAIN AT THE HOSPITAL WITH MY SON TO PROVIDE AS HIS FATHER THE UTMOST CARE THAT IN WHICH HE DESERVES UPON REVIEWING THE LETTER I RECEIVED IN THE MAIL FROM THE OFFICE OF CHILDREN YOUTH AND FAMILY I NOTICED THE DEFENDANT SHAMARA HOPKINS HAD INFCAT FALSIFIED REPORTS IN HER FALSELY FABRICATED DOCUMENT SHE FURTHER MORE STATED IN THE DOCUMENTS THAT MY SON WAS SENT TO THE HOSPITAL BY HIS PEDIATRICIANS OFFICE FOR (ALLEDGED CHILD ABUSE AND OR NEGLECT) THAT OF WHICH IS 100% FALSE AS PRIOR EXIBITS WILL SHOW THE FALSITY TO HER ALLEGATIONS WHEREFORE BY HER DOING THIS RAISE A CONCERN AND OR (CONFLICT OF INTERREST) DEFENDANT SHAMARA HOBKINS PROCEEDED TO CALL ME ON NOVEMBER 21ST TELING ME THAT SHE INFACT NEEDED TO ALLEDGEDLY (SET EYES ON MY SON) FOR WHAT REASON I HAVE NO CLUE AT THAT TIME DUE TO THE (CONFLICT OF INTERREST) I DENIED DEFENDANT SHAMARA HOPKINS ACCESS TO SEE MY SON AT THE HOSPITAL (AT NO TIME DID I EVER DENY CYS ACCESS TO SEE MY SON I ONLY DENIED HER ACCESS ON THE GROUNDS OF THE CONFLICT OF INTERREST FURTHERMORE OFFERING TO ALLOW

HER INTERN INTO THE HOSPITAL ROOM TO SET EYES ON MY SON THAT OF WHICH SHOWED MY WILLINGNESS TO WORK WITH CYS NOT HER SHE DENIED HER INTER THE RIGHT AN OR ABILITY TO SET EYES ON MY SON CLAIMING THAT ALLEDGEDLY HE WAS NOT ALLOWED TO DO SO WHEREFORE THEY DID NOT SET EYES ON MY SON AT THAT PRESENT MOMENT) ABOUT 24 HOURS LATER OUT OF AN ACT OF (VINDICTIVE RETALIATION DEFENDANT SHAMARA HOPKINS HAD A RANDOM CYS SUPERVISOR LAWRENCE WALTERS WHOM OF WHICH WAS NOT INVOLDED IN OUR CASE WHAT SO EVER FILE A RETALIATORY ("ORDER FOR EMERGENCY CUSTODY") SEE ATTACHED (EXHIBIT E) THAT OF WHICH CAUSED THEM TO TAKE CUSTODY OF MY SON ALL OF WHICH DEFENDANT SHAMARA HOPKINS DID THIS IN AN ACT OF VINDICTIVE RETALIATION DUE TO THE FACT THAT I WOULD NOT ALLOW HER TO SET EYES ON MY SON NOT EVEN 24 HOUR EARLIER DUE TO THE ALLEDGED CONFLICT OF INTEREST I HAD AGAINST HER THAT OF WHICH IS SHOWN THRU THE EXHIBITS ATTACHED HERE TO DUE TO PFA CUSTODY TERM I SWAPED OUT AT THE HOSPITAL WITH HIS MOTHER KAITLYN SANDERS ON NOVEMBER 22 AT 10:40 AM AND UPON DOING SO LEFT THE HOSPITAL ON NOVEMBER 24TH AT OR ABOUT 10:30 AM A SHELTER PLACEMENT HEARING WAS HELD AND CONDUCTED VIA A VIDEO COMFERENCE USING MICROSOFT TEAMS DURING THE COURSE OF THE SHELTER PLACEMENT HEARING ALLEGATIONS WERE RAISED AGAINST KAITLYN SANDERS FOR THE FOLLOWING REASONS CONSISTING OF HER FAILURE TO ADDEQUATELY REMAIN AT THE HOSPITAL ON A CONSISTANT REGULAR BASIS WITH HER SON AS WELL AS ISSUES OF CONCERN REGARDING HER MENTAL HEALTH ISSUES WERE ALSO RAISED REGARDING HER TIER 1 REGISTERED SEX OFFENDER BOYFRIEND WHOM WAS ARRESTED FOR STRANGULING HER ISSUES OF CONCERN WERE RAISED REGARDING HER EXTENSIVE USAGE OF DRUGS AT OR DURING THE VIDEO HEARING KAITLYN SANDERS STATED AND I QUOTE (I DID MY RESEARCH ON HIM AND FELT HE WAS OK TO BE AROUND) AT THE PLACEMENT HEARING ALLEGATIONS WERE ALSO RAISED AGAINST ME ALL OF WHICH WERE LESS SEVERE OF WHICH ALLEGATIONS MADE AGAINST ME WERE ALLEDGED ALLEGATIONS OF NEGLECT AND ABUSE FOR ALLEDGEDLY NOT FEEDING MY SON AND PROVIDING FOR HIM UNDER THE FALSE PRETENSE THAT HE IS ALLEDGEDLY UNDER WEIGHT THAT OF WHICH ARE FALSE ALLEGATIONS AS FOR HIS MEDICAL RECORDS CLEARLY SHOW A CONSISTANT GAIN OF WEIGHT THAT OF WHICH PER HIS MEDICAL RECORDS HE HAS CONTINUED TO SHOW CONSTANT WEIGHT GAIN WHEREFORE ANY AND ALL ALLEGATIONS AGAINST ME WOULD BE FALSE IN THEIR ENTIRETY AND DESPITE THE FACT THAT I HAVE DONE NOTHING WRONG TO MY SON THEY STILL CHOSE NOT TO ALLOW ME TO HAVE MY SON IN MY CARE INSTEAD PLACING HIM IN A FOSTER HOME IN MCKEESPORT UNDER THE CARE AND CUSTODY OF CYS.

DEFENDANT DEBORAH MONCRIEFF CAME TO MY HOUSE UNANNOUCED ON ONE OCCASION WHILE SHE WAS IN MY HOUSE MY BROTHER WASPHYSICALLY PRESENT AS WELL AS MY HOME HEALTH WORKER MAUREEN FROM HOME BUILDERS WHILE SHE WAS IN MY HOME I RAISED MULTIPLE ALLEGATIONS OF CONCERN TO HER AGAINST KAITLYN SANDERS TO INCLUDE CONCERNS REGARDING KAITLYN SANDERS CURRENT MENTAL HEALTH, HER CURRENT USSAGE OF MIND ALTERING DRUGS THAT OF WHICH KAITLYN SANDERS USES HER GOVERNMENT ISSUED CASH ASSISTANCE TO PAY FOR ILLEGAL AS IT IS SHE DOES IT I ALSO RAISED AN URGENT EXTREME CONSERN TO HER ABOUT KAITLYN SANDERS CURRENT TIER 1 REGISTERED SEX OFFENDER BOY FRIEND AT THAT TIME DEFENDANT DEBORAH MONCRIEFF STATED THAT SHE WAS GOING TO PREPARE TO FILE A AN EMERGENCY PROTECTIVE ORDER REMOVING MY SON FROM KAITLYN SANDERS CARE AT OF WHICH TIME MY BROTHER POSED THE QUESTION TO DEFENDANT DEBORAH MONCRIEFF STATING (YOU DO REALIZE THAT THEY HAVE CURRENT CUSTODY AGREEMENTS IN PLACE PER A FAMILY COURT JUDGE) SHE THEN STATED SHE WOULD CONTACT HER LAWYER TO HAVE THAT ISSUE CORRECTED AND OR TAKEN CARE OF AT THAT PRESENT TIME AT OR ON LATER OCCASIONS WHEN I CALLED HER ON THE PHONE SHE PROCEEDED TO CHANGE HER STORY CLAIMING THAT NONE OF THE ALLEDGED CONVERSATION PREVIOUSLY STATED EVER EXISTED AND THAT SHE NEVER SAID ANY OF IT DESPITE BOTH MY WITTNES LISTED ABOVE WHOM OF WHICH WERE

PRESENT AT ALL TIMES IN MY HOUSE WHILE SHE WAS THERE HEARD HER STATE EXACTLY WHAT I SAID SHE INFACT STATED ON OTHER OCCASIONS AFTER SHE LEFT MY HOUSE WHEN I SPOKE TO HER ON THE PHONE SHE CONTINUED TO FALSELY DEFAMATE MY CHARACTER AND SLANDER MY NAME BY INDIRECTLY AND DIRECTLY CLAIMING THAT I AM AN UNFIT FATHER THAT OF WHICH IS NOT TRUE FURTHERMORE CLAIMING THAT HE WENT TO THE HOSPIYAL FROM HIS PEDIATRICIANS OFFICE FOR BEING UNDER WEIGHT ALLEDGING THAT I WAS NOT FEEDING HIM CAUSING HIM TO LOSE WEIGHT THOSE ALLEGATIONS ARE ALSO FALSE IN THEIR ENTIRETY AS FOR HIS MEDICAL RECORD SHOW COSISTANT WEIGHT GAIN AND BY DEFENDANT SHAMARA HOPKINS AND DEFENDANT DEBORAH MONCRIEFF COMMITTING THESE ACT STATED HERE IN THIS CIVIL COMPLAINT NOT ONLY DID THEY SUBJECT ME TO MENTAL AND EMOTIONAL INJURY, PAIN AND SUFFERING BUT THEY INFACT KNOWINGLY AND WILLING FILED AND MADE FALSE ALLEGATIONS AGAINST ME IN AN ATTEMPT TO MALISHIOUSLY DEPRIVE ME OF A RIGHT TO BE A FATHER THAT OF WHICH I HAVE DONE IN ITS ENTIRETY SINCE MY SON WAS BORN PREMATURE AT MCGEE WOMANS HOSPITAL ON JULY 25[™] ,2023 AND BY DOING SO WAS IN VIOLATION OF MY CONSTITUTIONAL RIGHT BUT ALSO BY REMOVING MY SON FROM MY CARE HAS ALSO CAUSED MENTAL AND EMOTION PAIN AND SUFFERING TO MY SON SAFARI SANDERS BY TAKING HIM OUT OF THE CARE OF HIS FATHER OF WHICH PROVIDES THE UTMOST CARE TO HIM THAT OF WHICH HE DESERVES

4. RELIEF

PLAINTIFF IS ASKING THIS HONORABLE COURTS T GRANT RELIEF IN THIS CASE IN THE FOLLOWING MANNER AND OR FORMS OF RELIEF:

PLAINTIFF SEEK AN INJUNCTION RESTRAING DEFENDANT DEBORAH MONCRIEFF AND DEFENDANT SHAMARAH HOPKINS FROM HAVING ANDY INVOLVENT IN THE CURREN CYS CASE AND FOR THEM TO BE MADE TO CEASE ANY AND ALL INVOLVEMENT WITH ME AND MY SON SECOND THROUGHOUT THE ENTIRE COURSE OF THIS FEDERAL CIVIL SUIT AND TO CEASE AND AND ALL COMMUNICATION TO ME OR MY SON WHERTHER DIRECT INDIRECT OR THIRD PARTY

PLAINTIFF WOULD REQUEST ON HIS BEHALF PUNITIVE AND COMPENSATORY DAMAGES IN THE AMOUNT OF 3.5 MILLION DOLLARS

PLAITIFF WOULD SEEOK ON BEHALF OF HMSELF DAMAGES FOR PAIN AND SUFERING AS WELL AS MENTAL AND EMOTINAL ANGUISH IN THE AMOUNT OF 3.5 MILLION

PLAINTIFF DOES NOT SEEK MONETARY VALUE OR DAMAGES FOR THE HARM THAT THE DEFENDANTS CAUSED TOWARDS MY SON AS FOR YOU CANNOT PUT A PRICE ON A LIFE THAT WAS TAKEN AND I AM REFERING TO THE FACT THAT THEY WRONGFULLY TOOK MY SON FROM MY CARE VIA THEIR FALSE ALLEGATIONS AND OR STATEMENTS AS WELL AS THEIR FALSELY FABRICATED DOCUMENTATIONS

5. CERTIFICATION AND CLOSING

UNDER FEDERAL RULES OF CIVIL PROCEDURES 11, BY SIGNING BELOW, I CERTIFY TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF THAT THIS COMPLAINT (1) IS NOT BEING PRESENTED FOR AN IMPROPER PURPOSE, SUCH AS TO HARASS, CAUSE UNNECESSARY DELAY, OR NEEDLESSLY INCREASE THE COST OF LITIGATION; (2) IS SUPPORTED BY EXISTING LAW OR BY A NON FRIVOLOUS ARGUEMENT FOR EXTENDING, MODIFYING, OR REVERSING EXISTING LAW; (3) THE FACTUAL CONTENTIONS HAVE EVIDENTIARY SUPPORT OR, IF SPECIFICALLY SO INDENTIFIE, WILL LIKELY HAVE EVIDENTIARY SUPPORT AFTER A REASONABLE OPPERTUNITY FOR FURTHER INVESTIGATION OR DISCOVERY; AND (4) THE COMPLAINT OTHERWISE COMPLIES WITH THE REQUIREMENTS OF FEDERAL RULES OF CIVIL PROCEDURES (RULE 11)

I AGREEE TO PROVIDE THE CLERKS OFFICE WITH ANY CHANGES TO MY ADDRESS WHERE CASE RELATED PAPERS MAY BE SERVED, I UNDERSTAND THAT MY FAILURE TO KEEP A CURRENT ADDRESS ON FILE WITH THE CLERKS OFFICE MAY RESULT IN THE DISMISSAL OF MY CASE.

DATE OF SIGNING: _ 12/03/2023

SIGNATURE OF PLAINTIFF & SULLEY

PRINTED NAME OF PLAINTIFF: TRAVIS SCOTT CONKLIN